IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF GEORGIA

WANDA COOPER,

in her Individual Capacity and as Administrator: of the Estate of Decedent **AHMAUD ARBERY**:

Plaintiff

: Civil Action

v. : No. 2:21-CV-20-JRH-BWC

TRAVIS McMICHAEL and GREGORY
McMICHAEL and WILLIAM BRYAN
and POLICE OFFICER ROBERT RASH
and POLICE OFFICER RICKY MINSHEW
and GLYNN COUNTY, and JACKIE
JOHNSON and GEORGE BARNHILL,

:

Defendants.

PLAINTIFF'S MOTION FOR REQUEST FOR JUDICIAL NOTICE

COMES NOW, Plaintiff Wanda Cooper, in her Individual Capacity and as Administrator of the Estate of Decedent Ahmaud Arbery, in the above-captioned matter to file this Motion to Request Judicial Notice. In support thereof, Plaintiff provides the following:

Pursuant to Federal Rule of Evidence 201, Plaintiff requests for judicial notice of the facts contained in Plaintiff's Omnibus Response to Defendants' Motions to Dismiss attached as **Exhibit A** ("Indictment") and **Exhibit B** ("Barnhill Publication"). These documents provide the background of Plaintiff's claims and arguments, and the authenticity of the documents are not an issue. The subject of these facts are "generally known within the trial court's territorial jurisdiction" and "can be accurately and readily determined from sources whose accuracy cannot reasonably be questioned." *See* FRE 201(b).

Pursuant to the Rule, the court "may take judicial notice on its own" or "must take judicial notice if a party requests it and the court is supplied with the necessary information." *See* FRE 201(c).

WHEREFORE, Plaintiff respectfully requests that this Honorable Court grant this Motion by taking judicial notice of the facts and documents attached to Plaintiff's Omnibus Response to Defendants' Motions to Dismiss as Exhibits A and B.

Dated: September 28, 2022 Respectfully Submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on September 28, 2022, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to counsel or parties of record electronically by CM/ECF.

<u>/s/ Mark V. Maguire</u> Counsel for Plaintiff